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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Office of the City Manager

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July 12, 1993

JUL 21 1993

FCC - MAIL

Office of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Re: PR Docket No. 92-235;  
Refarming of Spectrum Below 800 mhz

Dear Commissioner:

The City of Hamilton supports the goals of the commission in it's efforts to improve spectrum efficiency and simplify operations. However, we have several concerns we wish to bring to your attention.

1. Financial Burden - Should the ultimate report and order necessitate systems replacement, which appears to be the case, we envision capital expenditures in excess of one million dollars over a period of ten to twelve years. With economic conditions as they are now and are projected to be for several years to come, this type of outlay for communications equipment would be extremely difficult, if not impossible, for us to accomplish.

We would have only one budget cycle between 1-1-94 and 1-1-96 to accomplish whatever changes were necessary as our annual budget is developed during the final quarter of the previous year. This could prove to be too heavy a burden for the single budget cycle.

If an economical modification to present equipment (manufactured between 1975 and 1992) were available, which is not the case, we would still face a difficult situation funding these modifications in the near term.

Therefore, we ask you to consider a more gradual migration time table for mandatory channel split compliance. We believe we are not alone in our predicament and feel that more gradual migration would be prudent for us and many others.

2. Public Safety Operations - Since our Police and Fire Divisions rely heavily upon their mobile relays, their operations would be severely degraded should their relays be lost.

Our Police Division uses digital voice encryption for privacy of certain communications. This encrvption requires 4.0 khz deviation and would be

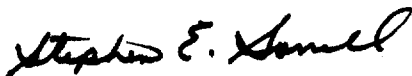
Paging and tone coded squelch operation could become unreliable or fail at the 3.0 khz modulation deviation level.

Protection should be afforded, for mutual aid purposes, interagency communications capability.

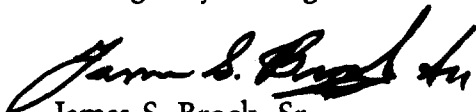
All communications for City services would suffer a certain amount of degradation in audio quality. Since safety services depend so much on their communications and getting the message right the first time any substantial loss of audio quality could well become a critical issue.

The above stated concerns will have a direct impact upon the City of Hamilton's capacity to deliver essential services to our residents. Therefore, we add our support to the Land Mobile Communications Council's comments of 4/28/93 and the Associated Public Safety Communications Officers comments of 1/12/93. Realizing that quality communications are vital to us all, we hope that a reasonable accommodation for all may be arrived at while achieving the stated goals of refarming.

Sincerely,



Stephen E. Sorrell  
Acting City Manager



James S. Brock, Sr.  
Electronic Communications Technician II